

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL ITS RESPONSIVE TRIAL  
BRIEF**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 I make this declaration in support of Waymo’s Administrative Motion to File Under Seal  
7 its Responsive Trial Brief, filed concurrently herewith (the “Administrative Motion”). The  
8 Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

9 Document	Portions to Be Filed Under Seal	Designating Party
10 Waymo’s Responsive Trial Brief	Highlighted portions	Waymo (green)
11 Exhibit A to Waymo’s Responsive Trial Brief	Highlighted portions	Waymo (green)
12 Exhibit B to Waymo’s Responsive Trial Brief	Highlighted portions	Waymo (green)
13 Exhibit D to Waymo’s Responsive Trial Brief	Entire document	Waymo and Defendants

15 2. Specifically, the green highlighted portions of Waymo’s Responsive Trial Brief and  
16 Exhibits A and B thereto, as well as the entirety of Exhibit D to Waymo’s Responsive Trial Brief,  
17 contain or refer to trade secret and/or confidential business information, which Waymo seeks to seal.

18 3. The entirety of Exhibit D contains, references, and/or describes Waymo’s trade secrets.  
19 The information Waymo seeks to seal includes the confidential design and functionality of Waymo’s  
20 proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as  
21 secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that  
22 the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of this  
23 information would give Waymo’s competitors access to descriptions of the functionality or features of  
24 Waymo’s autonomous vehicle system. If such information were made public, I understand that  
25 Waymo’s competitive standing would be significantly harmed.

26 4. Waymo’s Responsive Trial Brief, as well as Exhibit B thereto, contain, reference,  
27 and/or describe Waymo’s highly confidential and sensitive business information. The information  
28

1 Waymo seeks to seal regards confidential details regarding Waymo's business and competition,  
2 including the names and addresses of suppliers for Waymo's LiDAR technology. I understand that  
3 this confidential business information is maintained by Waymo as secret. The public disclosure of  
4 this information would give Waymo's competitors access to Waymo's business strategy for its  
5 autonomous vehicle system. If such information were made public, I understand that Waymo's  
6 competitive standing would be significantly harmed.

7 5. In addition, the green highlighted portions of Exhibits A and B to Waymo's  
8 Responsive Trial Brief contain addresses of former Waymo employees involved in this case, the  
9 disclosure of which would cause Waymo and those employees substantial harm due to the high public  
10 profile of this litigation.

11 6. Waymo's request to seal is narrowly tailored to those portions of its Responsive Trial  
12 Brief and exhibits thereto that merit sealing.

13 7. Waymo also seeks to seal Exhibit D to Waymo's Responsive Trial Brief as identified  
14 in the table above because Waymo believes it contains information considered confidential or non-  
15 public by Defendants.

16  
17 I declare under penalty of perjury under the laws of the State of California and the United  
18 States of America that the foregoing is true and correct, and that this declaration was executed in San  
19 Francisco, California, on November 26, 2017.

20 By /s/ Felipe Corredor

21 Felipe Corredor  
22 Attorneys for WAYMO LLC  
23

24 **SIGNATURE ATTESTATION**

25 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
26 filing of this document has been obtained from Felipe Corredor.

27 /s/ Charles K. Verhoeven

28 Charles K. Verhoeven